



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

August 13, 1982

RECEIVED

Joel Blumstein, Esquire
U. S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

AUG 19 1982

REGION I
OFFICE OF REGIONAL COUNSEL

Re: Picillo Waste Disposal Site - Coventry,
Rhode Island; Request for Information

Dear Mr. Blumstein:

This follows our telephone conversation on Tuesday, August 10, in which we discussed Olin's compliance with EPA's Request for Information in connection with the above-captioned matter.

As you and I agreed, I am herewith providing you with the shipping documents, invoices, service orders and other similar information in connection with Olin's shipment of chemical wastes to the Capuano Brothers landfill in Cranston, Rhode Island. Olin made two shipments of chemical wastes to the State of Rhode Island and these were to the Capuano landfill in August and September, 1977.

The above shipments were made through Chemical Waste Removal, Inc. of Bridgeport, Connecticut. As noted above, Olin intended that the chemical wastes, encompassed by the attached documents, to be disposed of at the Capuano landfill in Cranston, Rhode Island. We first became aware of the apparent disposal at the Picillo site when Olin received a telephone call from Mr. John Leo of the Rhode Island Department of Environmental Management.

For your convenience, I have attached two appendices in which I have included the above documents. Appendix A includes a service order, purchase invoice approval, Chemical Waste Removal, Inc. invoice and a shipping order to Capuano Brothers regarding the August shipment of chemical waste; Appendix B contains similar documentation in connection with our shipment of waste materials in September, 1977, to the Capuano landfill.

My Direct Dial Number:

203-789-5330

O L I N C O R P O R A T I O N



SEMS DocID

642496

Joel Blumstein, Esquire
Page 2
August 13, 1982

In reviewing our purchase orders and related invoices, for the period January 1, 1974 to and including December 31, 1977, we did determine that chemical wastes were shipped to New Jersey for final disposal via two companies, S. W. S. Associates and Atlas, Inc.; both these companies were owned and operated by Mr. Earl Weigel of Bloomsberry, New Jersey. We have information to suggest that some of these wastes may have been disposed of at the Chemical Control Corporation site in Elizabeth, New Jersey; however, our best information is that all of these were incinerated by Chemical Control.

Additionally, we identified two purchase orders (Purchase Orders RC-43844 and RC-43863; see Appendix C) concerning the disposal of a quantity of swimming pool chemicals with Chemical Control Corporation.

Purchase Order RC-43844 relates to a shipment of HTH® (calcium hypochlorite), delivered to Atlas, Inc. for final disposal with Chemical Control. We, however, also have some information suggesting that this material was taken to Rickel Brothers in Bergenfield, New Jersey rather than Chemical Control. In any event, the material consisted of 19 cases of calcium hypochlorite, a swimming pool and water purification compound. Chemical Control also may have been used by Olin during 1978 for disposal of broken containers of and off specification calcium hypochlorite.

Purchase Order RC-43863 concerns the disposal of 3,000 lbs. of trichloro-s-triazinetriene, also an Olin swimming pool chemical, in September, 1978. The material was located at a warehouse in Patterson, New Jersey and our records only show that Chemical Control picked up this material for disposal but does not indicate where the final disposal took place.

Finally, I have verified the foregoing with Olin personnel responsible for chemical disposal and it is their best recollection that Olin made no other shipments, other than what is described above, to the State of Rhode Island or with the companies and/or individuals listed on page 2 of Mr. Sutton's July 22 letter to Dr. Heying. In short, the foregoing and enclosed materials represents all the transactions, involving chemical waste disposal, between Olin and waste disposal sites or landfills in the State of Rhode Island and/or with the companies disclosed to us in the above correspondence.

Joel Blumstein, Esquire
Page 3
August 13, 1982

Please feel free to call me at my New Haven office if you wish to discuss any of the foregoing or enclosures further.

Sincerely,

A handwritten signature in black ink, appearing to read "Allyn Myles Carnam". The signature is fluid and cursive, with a large, prominent loop at the end of the last name.

Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures

cc: Daniel J. Schatz, Esquire
Special Assistant Attorney General

Appendix A

Appendix A

906-962-344-8462000 \$1440
 906-967-344-8467000 \$935
 906-966-344-8466000 \$550
 906-990-344-8490000 ~~\$1153~~
 \$238.15

PURCHASING INVOICE APPROVAL

OM 217P

RC-3158

INSTRUCTIONS:

1. Complete this form for equipment, materials, or services for which a Purchase Order has not been issued.
2. May be used for purchases with a total value of \$500 or a total value of \$1,000, if such higher limit is permitted by operating unit approved written procedures.
3. Original and duplicate of invoice(s) must be attached.
4. Sign with full signature in ink in space provided.
5. Forward to appropriate Purchasing Department.

INVOICE RECEIVED FROM Chemical Waste Removal		INVOICE DATE 9-8-77	INVOICE NO. 1227	AMOUNT \$2,163.
CHARGE ACCOUNT NUMBER	DEPARTMENT Chemicals R+D	LOCATION New Haven		

PURCHASE
AND
RECEIPT

I certify that the materials or services covered by the attached invoice(s) were purchased by me in accordance with applicable standard procedures, and that the goods or services have been received.

SIGNATURE

J. A. Gillis

DATE

9/12/77

APPROVAL

Must have requisitioning authority to cover amount of purchase.

SIGNATURE

C. F. Sheld

DATE

9/13/77

FOR ACCOUNTING USE ONLY

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

REVIEW BY PURCHASING

SIGNATURE

DATE

Phone 234-355

[illegible]

1227

All claims and returned goods
MUST be accompanied by this bill.

Thank You

RESEARCH CENTER SERVICE ORDER

South Winchester Avenue
New Haven, Connecticut 06504
Phone 777-7900 Area Code 203
Ext. 644

No. RC- 3158

OWNER 10910092

TO

Chemical Waste Removal Inc.
P.O. Box 9055
Bridgeport, Ct.

REQUISITION NO. rf-2237

DATE 8/31/77

OWNER'S ORDER NO. MUST APPEAR ON ALL PACKAGES,
SHIPPING DOCUMENTS, INVOICES AND CORRESPONDENCE.
QUANTITY, UNITS, AND OWNER'S CODE NO. MUST
APPEAR ON INVOICES AND PACKING LISTS.

MAIL INVOICES IN TRIPLICATE TO:

W.C. Ready 1K5

INVOICING

OLIN CORPORATION
275. SO. WINCHESTER AVE. BLDG "K"
NEW HAVEN, CONN. 06504

CONTRACTOR:

☐ WINCHESTER WESTERN DIVISION
☒ CORPORATION ☐ PARTNERSHIP ☐ INDIVIDUAL

PLACE OF WORK

☐ OLIN BRASS
☐ METALLURGICAL LABORATORIES

SCHEDULE

BEGIN

COMPLETE

8/31/77

OWNER'S CODE NO.

312 NO.

ACCOUNTING CHARGE NO.

Various

TERMS AND CONDITIONS PRINTED ON THE REVERSE SIDE HEREOF AND ANY SUPPLEMENTAL
CONDITIONS ATTACHED HERETO ARE ESSENTIAL TERMS OF THIS ORDER

SCOPE OF WORK (See Section I Other Side)

DESCRIPTION

QUANTITY

UNIT PRICE

AMOUNT

55 GAL. DRUMS OF HTH SAMPLES
(OXIDIZER)

Pick up and remove for disposal, the following chemicals:

- 16 ea. Drums of packed chemicals OF PTKED "F"
- 16 ea. Drums of Polyols
- 3 ea. Drums of Isocyanates
- 3 ea. Drums of packed HTH samples

2 EA. 55 GAL. DRUMS OF PAKED "C"

Charge numbers: 906-962-344-8482-000 = \$440.00 906-966-344-8466-000 = \$550.00
906-967-344-8467-000 = \$935.00 906-990-244-8490-000 = \$165.00

1 EA. 55 GAL. DRUM OF PAKED "D"

10 EA. 15 GAL. DRUMS OF POLYOLS

ABOVE WORK TO BE DONE IN ACCORDANCE WITH THE DOCUMENTS IDENTIFIED BELOW WHICH ARE ATTACHED TO, AND CONSIDERED A PART OF, THIS ORDER. ANY
QUESTIONS CONCERNING THIS ORDER OR THE ATTACHED DOCUMENTS SHOULD BE BROUGHT TO THE ATTENTION OF THE BUYER BEFORE WORK IS STARTED.

THIS ORDER MUST BE ACKNOWLEDGED AND INSURANCE CERTIFICATE MUST

BE SENT TO THE ATTENTION OF W. C. READY 1-K-5.

MATERIALS ARE FOR DISPOSAL

D.A. Gillis

E. T. Shields

SEND INVOICE COPIES TO:

AMOUNT

☐ COST ACCOUNTING

☐ PROPERTY SEC'D

FIXED PRICE

PE * NOT TO EXCEED \$2,090.00

* The aggregate cost of performance of this order shall not exceed the amount as indicated above. Contractor shall not be entitled to reimbursement for cost above this amount
unless authorized in writing by owner. Time and material must be submitted daily to Project Engineer and all invoicing must be accordance with rates as established with owner
in your letter dated. Copy of which is on file in this office.

NAME OF
CONTRACTOR:

BY Chemical Waste Removal Inc.

DATE

8/31/77

SEND SHIPPING COPY AND INVOICE

OLIN CORPORATION

BY

W.C. Ready



275 WINCHESTER AVENUE, NEW HAVEN 4, CONNECTICUT

SHIPPING ORDER NO.

994-10

NOTE: If "BILL TO" is different than "SHIP TO" indicate in SPECIAL INSTRUCTIONS.

SHIP TO: CAPUANO BROS.
CRANSTON, RHODE ISLAND

SHIP VIA: CHEMICAL WASTE REMOVAL, INC.
TRUCK

SHIPPING CHARGES TO BE PAID BY

☐ OLIN MATHIESON

☒ RECIPIENT OF GOODS

ORIGINATED BY

- ☐ WINCHESTER-WESTERN DIVISION
☐ RAMSET
☐ OLIN BRASS
☐ METALLURGICAL LABORATORIES
☒ OLIN RESEARCH CENTER

CASES

CAR NO.

INVOICE DATE

CUSTOMER ORDER NO.

RC-3158

WEIGHT

B/L NO.

TERMS

DATE

8/31/77

QUANTITY	UNIT	DESCRIPTION	QUANTITY SHIPPED	UNIT PRICE	AMOUNT DUE
3	EA.	55 GAL. DRUMS OF HTH SAMPLES (OXIDIZER) 962	3		
5	EA.	55 GAL. DRUMS OF PACKED "F" 967	5		
8	EA.	55 GAL. DRUMS OF PACKED "D" 990	8		
2	EA.	55 GAL. DRUMS OF PACKED "C" 962	2		
1	EA.	55 GAL. DRUM OF PACKED "B" 966	1		
16	EA.	55 GAL. DRUMS OF POLYOLS 966	16		
3	EA.	55 GAL. DRUMS OF ISOCYANATES 966	3		

SEE ATTACHED LIST

REASON FOR SHIPMENT

MATERIALS ARE FOR DISPOSAL

38 DRUMS X \$55 = \$2090

SPECIAL INSTRUCTIONS

SEND INVOICE COPIES TO:

☐ COST ACCOUNTING

☐ PROPERTY SECTION

☐ PERSONS LISTED BELOW

SEND SHIPPING COPY AND PACKING LIST TO: (NAME AND LOCATION)

DECLARED VALUE

ACCOUNT CREDITED

D. A. GILLIS

SUPERVISOR, SAFETY & LOSS PREVENTION

DATE

8/31/77

REQUESTED BY

D.A. Gillis

APPROVED BY

Appendix B

OWNER 10910095

TO

REQUISITION NO. rf-2271

DATE 9/29/77

Chemical Waste Removal, Inc.
P. O. Box 9055
Bridgeport, CT 06601

OWNER'S ORDER NO. MUST APPEAR ON ALL PACKAGES,
SHIPPING DOCUMENTS, INVOICES AND CORRESPONDENCE.
QUANTITY, UNITS, AND OWNER'S CODE NO. MUST
APPEAR ON INVOICES AND PACKING LISTS.

MAIL INVOICES IN TRIPLICATE TO:
W.C. Ready 1K5

INVOICING

OLIN CORPORATION
275. SO. WINCHESTER AVE. BLDG "K"
NEW HAVEN, CONN. 06504

906-966-344-8466000
CORPORATION PARTNERSHIP INDIVIDUAL
PLACE OF WORK

SCHEDULE	OWNER'S CODE NO.
BEGIN	
COMPLETE	
9/28/77	See Below

Tract C

TERMS AND CONDITIONS PRINTED ON THE REVERSE SIDE HEREOF AND ANY SUPPLEMENTAL
CONDITIONS ATTACHED HERETO ARE ESSENTIAL TERMS OF THIS ORDER.

SCOPE OF WORK (See Section 1 Other Side)

INVOICES RECEIVED FROM
Pick up and remove for disposal, the following chemicals:
42 each, 55 gallon drums of "A" side polyols.
17 each, 55 gallon drums of "B" side isocyanates.
21 each, 55 gallon drums of packed chemicals

PURCHASE AND RECEIPT CHARGES
906-966-344-8466000 \$3,245.00
906-990-344-8490000 385.00
906-967-344-8467000 385.00
906-962-344-8462000 385.00
\$4,400.00

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

REVIEW BY PURCHASING

ABOVE WORK TO BE DONE IN ACCORDANCE WITH THE DOCUMENTS IDENTIFIED BELOW WHICH ARE ATTACHED TO AND CONSIDERED A PART OF THIS ORDER. ANY
QUESTIONS CONCERNING THIS ORDER OR THE ATTACHED DOCUMENTS SHOULD BE BROUGHT TO THE ATTENTION OF THE BUYER BEFORE WORK IS STARTED.

PLEASE ACKNOWLEDGE THIS ORDER TO THE ATTENTION OF W. C. READY.

INSURANCE CERTIFICATE IS ON FILE IN THE OFFICE OF W. C. READY.

D. A. Gillis
D. A. Gillis

E. T. Shields
E. T. Shields

AMOUNT

FIXED PRICE
* NOT TO EXCEED \$4,400

The aggregate cost of performance of this order shall not exceed the amount as indicated above. Contractor shall not be entitled to reimbursement for cost above this amount
unless authorized in writing by owner. Time and material must be submitted daily to Project Engineer and all invoicing must be accordance with rates as established with owner
in your letter dated. Copy of which is on file in this office.

NAME OF CONTRACTOR
BY Chemical Waste Removal DATE BY W.C. Ready

906-966-344-8466000 \$3200
 906-990-344-8490000 \$375
 906-967-344-8467000 \$385
 906-962-344-8462000 \$385

INSTRUCTIONS:

1. Complete this form for equipment, materials, or services for which a Purchase Order has not been issued.
2. May be used for purchases with a total value of \$500 or a total value of \$1,000. If such higher limit is permitted by operating unit approved written procedures.
3. Original and duplicate of invoice(s) must be attached.
4. Sign with full signature in ink in space provided.
5. Forward to appropriate Purchasing Department.

PURCHASING INVOICE APPROVAL

OM 217P

RC-3181

INVOICE RECEIVED FROM Chemical Waste Removal		INVOICE DATE 9-29-77	INVOICE NO. 1266	AMOUNT \$4345
CHARGE ACCOUNT NUMBER	DEPARTMENT Chemicals R+D	LOCATION New Haven		

PURCHASE
AND
RECEIPT

I certify that the materials or services covered by the attached invoice(s) were purchased by me in accordance with applicable standard procedures, and that the goods or services have been received.

SIGNATURE

D. A. G. L. S.

DATE

10/4/77

APPROVAL

Must have requisitioning authority to cover amount of purchase.

SIGNATURE

C. J. Shields

DATE

10/4/77

FOR ACCOUNTING USE ONLY

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

REVIEW BY PURCHASING

SIGNATURE

DATE

P.O. Box 9055
BRIDGEPORT, CONNECTICUT 06601
Phone 334-4365

[illegible]

1266

All claims and returned goods
MUST be accompanied by this bill.

Thank You



876 WINCHESTER AVENUE, NEW HAVEN 4, CONNECTICUT

SHIPPING ORDER NO.

994-11

NOTE: If "BILL TO" is different than "SHIP TO" indicate in SPECIAL INSTRUCTIONS.

SHIP TO: CAPUANO BROS.
CRANSTON, RHODE ISLAND

SHIP VIA: CHEMICAL WASTE REMOVAL,
BRIDGEPORT, TRUCK

SHIPPING CHARGES TO BE PAID BY

☐ OLIN MATHIESON

☒ RECIPIENT OF GOODS

ORIGINATED BY

- ☐ WINCHESTER-WESTERN DIVISION
☐ RAMSET
☐ OLIN BRASS
☐ METALLURGICAL LABORATORIES
☐ OLIN RESEARCH CENTER

CASES.

WEIGHT

CAR NO.

B/L NO.

INVOICE DATE

TERMS

CUSTOMER ORDER NO.

DATE

QUANTITY	UNIT	DESCRIPTION	QUANTITY SHIPPED	UNIT PRICE	AMOUNT DUE
42	EA.	OF "A" SIDE POLYOLS	42		
17	EA.	OF "B" SIDE ISOCYANATES	17		
21	EA.	OF PACKED CHEMICALS (VARIOUS UNKNOWN)	21		
RC-3181					

REASON FOR SHIPMENT

MATERIALS ARE FOR DISPOSAL

SPECIAL INSTRUCTIONS

SEND INVOICE COPIES TO:

- ☐ COST ACCOUNTING ☐ PROPERTY SECTION
☐ PERSONS LISTED BELOW

D. A. GILLIS
SUPERVISOR, SAFETY
& LOSS PREVENTION

REQUESTED BY
D.A. Gillis
APPROVED BY

DATE

SEND SHIPPING COPY AND PACKING LIST TO: (NAME AND LOCATION)

DECLARED VALUE

ACCOUNT CREDITED

56 ⁸ Polyol
20 Isocyanates
37 LAB PACKS
3 HTH Samples

Total 116₈

10910100

APPENDIX C

ORDERED
FROM

CHEMICAL CONTROL CORPORATION
23 SOUTH FRONT STREET
ELIZABETH NJ 07202

(BUYER)

DATE OF
ORDER 7/24/78PURCHASE
ORDER NO. RC-43844

DELIVER TO: OLIN RESEARCH CENTER - GATE "K"
275 SOUTH WINCHESTER AVE.
NEW HAVEN, CONN. 06504

ATTN OF:

INVOICING: MAIL INVOICES IN TRIPLICATE TO:
OLIN CORPORATION
120 LONG RIDGE ROAD
STAMFORD, CONN. 06904

ATTN: ACCOUNTING SERVICES DEPT.

(SELLER)

SHIP VIA CHEAPEST WAY UNLESS OTHERWISE SPECIFIED

N/A

DELIVER ON OR BEFORE

Completed

SELLERS QUOTE NO. OR DATE

F.O.B.

N/A

TERMS:

Net 10 days

SUBJECT TO CONN. SALES TAX

☒ YES ☐ NO

QUANTITY RECEIVED	UNIT	QUANTITY ORDERED	UNIT	DESCRIPTION	PRICE	ACCOUNT CHARGE
		19	case	PICK UP AND DESTROY CASES OF HTH GRANULAR @ 10.00/ea. MATERIAL PICKED UP AT RICKEL BROS. IN BERGENFIELD, NJ.	\$190.00	351- 159
CONFIRMING ORDER - DO NOT DUPLICATE						
SEE ATTACHED INVOICE APPROVAL						

COMPLETED
RECEIVED
NOV 6 1978
C. R. P. 1978

REQUISITION NO.	DELIVER TO (NAME AND LOCATION)	DEPT. NO.	ESTIMATED VALUE
94	NA	965	\$190.00
REQUISITIONER (SIGNATURE)	DATE REQUIRED	APPROVER (SIGNATURE)	DATE
F. M. Gray <i>F. M. Gray</i>	NA	<i>K. C. Dyer</i>	11/3/78
REQUISITIONER'S SUGGESTED VENDOR	Chemical Control Corporation, Elizabeth, NJ 07202		

ORDERED FROM Chemical Control Corp. 23 South Front Street Elizabeth, NJ 07202	(BUYER)	DATE OF ORDER 9/10/78	PURCHASE ORDER NO. RC-43363
	DELIVER TO: OLIN RESEARCH CENTER - GATE "K" 275 SOUTH WINCHESTER AVE. NEW HAVEN, CONN. 06504		
	ATTN OF:		
	INVOICING: MAIL INVOICES IN TRIPLICATE TO: OLIN CORPORATION 120 LONG RIDGE ROAD STAMFORD, CONN. 06904		
	ATTN: ACCOUNTING SERVICES DEPT.		

SHIP VIA CHEAPEST WAY UNLESS OTHERWISE SPECIFIED N/A	DELIVER ON OR BEFORE Completed	SELLERS QUOTE NO. OR DATE
F.O.B. N/A	TERMS: Net 10 days	SUBJECT TO CONN. SALES TAX <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

QUANTITY RECEIVED	UNIT	QUANTITY ORDERED	UNIT	DESCRIPTION	PRICE	ACCOUNT CHARGE
				Emergency pick up and disposal of approximately 3,000 lbs trichloroethylene in damaged containers <i>1500/minute</i> Above material picked up at Bunker Hill Warehouse, Paterson, NJ CONFIRMING - DO NOT DUPLICATE COMPLETE RECEIVED NOV 2 1978 READY CL	\$1500.00	906-9 239-8 000

REQUISITION NO. 85	DELIVER TO (NAME AND LOCATION)	DEPT. NO. 965	ESTIMATED VALUE \$1500.00
REQUISITION SIGNATURE <i>[Signature]</i>	DATE REQUIRED Completed	APPROVED BY SIGNATURE <i>[Signature]</i>	DATE 11/7/78
SUGGESTED VENDOR Chemical Control Corp., Elizabeth, NJ 07202			



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

July 27, 1982

Joel Blumstein, Esquire
U. S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

Re: Picillo Waste Disposal Site - Coventry,
Rhode Island; Request for Information

Dear Mr. Blumstein:

This confirms my attempt to reach you at your office on Tuesday, July 27, 1982, in response to Mr. Sutton's July 22 letter to Theodore Heying, Ph.D., of the Olin Corporation of New Haven, Connecticut, regarding the above-captioned matter. Your office advised me that you were on vacation for the balance of this week and since I will be on vacation until August 9, I do want an opportunity to discuss Mr. Sutton's letter with you before Olin submits a formal response.

As you may know, Olin has submitted data and information, similar to what you requested, to the State of Rhode Island through Mr. John P. Leo of the State Department of Environmental Management. A copy of this letter is enclosed herewith for your information and review. I also will plan to call you when I return from my vacation on August 9 to discuss Olin's formal response to EPA's July 22 letter.

Sincerely,


Allyn Nyles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosure

cc: Daniel J. Schatz, Esquire
Special Assistant Attorney General

My Direct Dial Number:

203-789-5330



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

June 23, 1982

HAND DELIVERED

John P. Leo, Engineer
c/o Picillo Site
Coventry, Rhode Island

Re: Picillo Property
Coventry, Rhode Island

Dear Mr. Leo:

This is to confirm a site visit, to the above-captioned property, by R. S. Hendey of Olin Corporation and the undersigned, at your invitation, for the purpose of facilitating the identification of any material generated by the Olin Corporation or disposed of by Olin, found at the above-captioned site. For the record, and as we discussed during our visit, Olin's internal, waste disposal records do not reflect any chemicals, waste materials or any other compounds being shipped to the above-captioned location. Our records, however, do indicate two shipments of materials to the Capuano Brothers landfill in Cranston, Rhode Island.

Both of the shipments to Rhode Island were made through Chemical Waste Removal, Inc., Bridgeport, Connecticut. The first shipment occurred on or about August 31, 1977 and the second shipment was made, also through Chemical Waste Removal, on September 29, 1977. Our records do not specifically identify the materials sent to Cranston; however, the waste do fall into three general categories:

1. HTH® samples (calcium hypochlorite)
2. Isocyanates
3. Polyols

During the course of our site visit to the Picillo property, we inspected two 55 gallon drums which you believed may have originated at the Olin Corporation. You also noted two other containers either sent to or from Olin in New Haven, Connecticut. These two containers

My Direct Dial Number:

203-789-5330

John P. Leo
Page 2
June 23, 1982

consisted of a 5 gallon pail with the designation Emery 9877-U fatty acid and a smaller container apparently delivered by the Humphrey Chemical Company, North Haven, Connecticut to Olin in New Haven.

I have been able to develop some additional information for you in connection with the foregoing and I am also providing you herewith product data sheets and bulletins, material safety data sheets and other identified data and information concerning the three compounds described above as well as other chemicals for which you requested physical property data.

First, in connection with the material apparently mailed to Olin from the Humphrey Chemical Company, I have spoken with our Sam Trotz, Ph.D., and he advises me that it is likely that the material sent by Humphrey, in the four small ampules, is 2,4-difluoronitrobenzene. This compound is an intermediate in the manufacture of difluoroaniline, itself an intermediate in the manufacture of an oral drug preparation manufactured and distributed by Merck Company. For your information, I am herewith enclosing Olin's Material Safety Data Sheet for 2,4-difluoronitrobenzene.

Secondly, we have yet to identify the waxy, viscous light brown material found in the 5 gallon pail. However, I will still continue to interview appropriate personnel in New Haven to attempt to ascertain the nature of this material. If I am able to develop some more definitive information on the identity of this substance, I will contact you immediately.

Thirdly, in connection with the isocyanate material which may be present on-site, I am herewith providing you with the following information:

- (a) Technical data and information furnished us by the Upjohn Polymer Chemicals Company concerning the polymeric isocyanurate compounds we purchase from them. This information and materials include two technical bulletins and a material safety data sheet.
- (b) Olin's material safety data sheet, product data bulletin and product storage and handling bulletin for our isocyanate family of chemicals.
- (c) A general Olin bulletin on toluene diisocyanate (750-008).

Fourth, I am enclosing herewith some general data and information concerning our polyol compounds manufactured by Olin. This information will provide you with the relevant physical properties for all our polyol products:

John P. Leo
Page 3
June 23, 1982

- (a) material safety data sheet and application data bulletin for Poly-G® 32-56
- (b) material safety data sheet and application data bulletin for Poly-G® 71-530
- (c) material safety data sheet and product data bulletin for Thermolin® RF-230

Fifth, I am also herewith enclosing for your information and use Olin's material safety data sheet for calcium hypochlorite. Inter alia, this information includes a description of the physical properties of calcium hypochlorite.

As we discussed, I found it very difficult to precisely identify the nature of the material in any of the drums or containers you believe have come from Olin. We also discussed the fact that Olin's records, in addition to not reflecting any shipments to the Picillo Property, only indicate, in a general way, the nature of the materials (see description above) sent to the Capuano Brothers' landfill in Cranston, Rhode Island. With this as background, I suspect you can appreciate the difficulty we are having in identifying the substances involved with any degree of precision. Nonetheless, we are herewith providing you with data and information, concerning the physical properties, of the two main chemical categories or families described above, viz; the isocyanates and polyols.

I am also compelled to point out that in addition to any of the materials found at the Picillo property not being sent directly to this site; we, as you might expect, have no way of knowing whether any of the materials originally sent to Cranston, by Olin, are, in fact, still in the original container(s), or whether other compounds have been substituted for or reacted with these materials. I am sure you have dealt with this potential problem in the past but I think it is sufficiently important to raise it with you as it may apply to the containers inspected by us.

I hope the foregoing has been helpful and the enclosures in some way facilitate your final disposal of the above waste materials. We will continue, at this end, to seek to generate any additional information which may be of assistance to you. However, I trust you will feel free to contact me in New Haven or R. S. Hendey in Stamford in connection with anything we discussed during our site visit on Tuesday, June 22, or any other related matter.

John P. Leo
Page 4
June 23, 1982

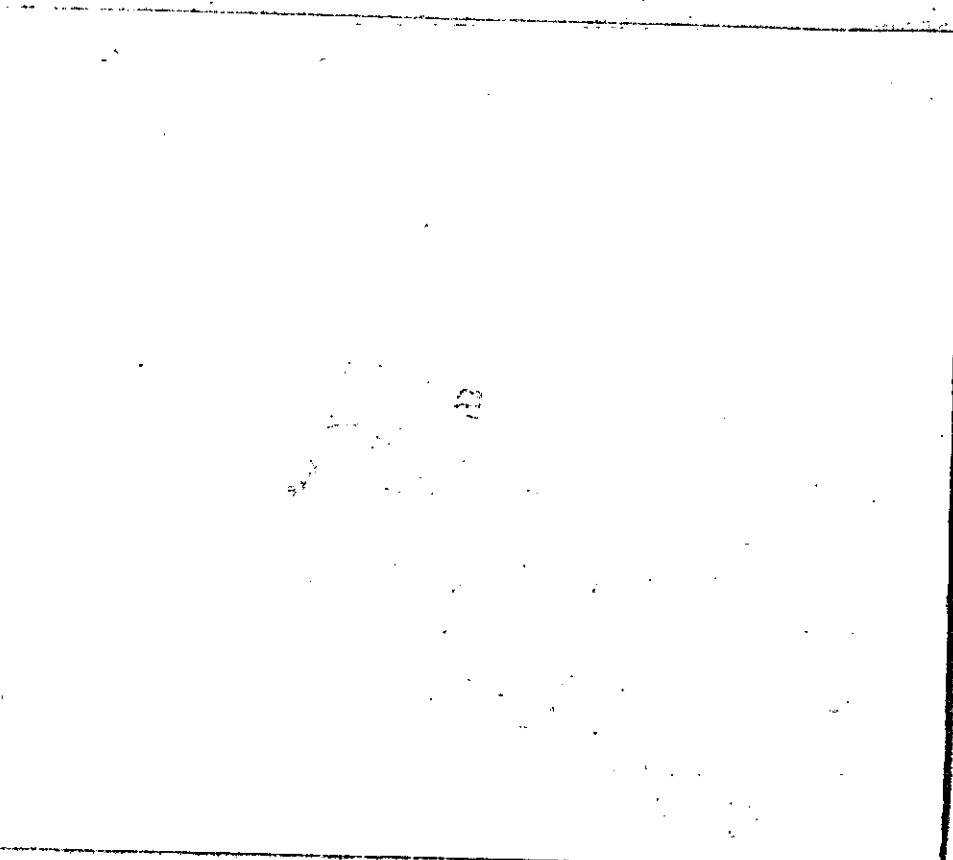
Mr. Hendey and I again want to thank you and your associates, especially Mr. Brodd, for all the help and information you provided us during our visit and again, we trust you will feel free to call upon us in the future if we can be of any additional assistance to you.

Sincerely,



Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures

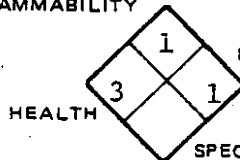




EMERGENCY PHONE (203) 356-2345

Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

MATERIAL SAFETY DATA

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS 2,4-Difluoronitrobenzene		
CHEMICAL FAMILY Fluoroaromatic	FORMULA $C_6H_3NO_2F_2$	TRADE NAME 2,4-DFNB
DESCRIPTION Yellow liquid		CAS NO. 70-34-8

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin or on clothing. Do not take internally. Avoid breathing mist or vapor. Store in a cool, dry place away from oxidizing materials or flames.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
Eyes Goggles Gloves Required Other Coveralls and impervious boots	Local exhaust ventilation required where exposures to mist or vapors might occur.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS
2,4-difluoronitrobenzene	95%min				

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD >200°F TOC	OSHA CLASSIFICATION Class IIIB Combustible liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water spray, dry chemical, foam, carbon dioxide. Cool fire-exposed containers with water.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established.	
SYMPTOMS OF OVER EXPOSURE Cyanosis, tremors and convulsions, irritation to eyes, skin and mucous membranes.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Wash with water for 15 minutes, call a physician.
EYES	Wash with water for 15 minutes, call a physician.
INGESTION	Drink water, induce vomiting by sticking finger down throat, call a physician.
INHALATION	Remove victim to fresh air, call a physician.

Chemical 2,4-Difluoronitrobenzene CAS No. 70-34-8

10910109

CHEMICAL NAME 2,4-Difluoronitrobenzene

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50	273 mg/kg (mice)	CARCINOGENIC	Not known to be carcinogenic
ACUTE DERMAL LD 50	~375 mg/kg (rabbit)	MUTAGENIC	Positive Ames test
ACUTE INHALATION LC 50	> 1.29 mg/liter of inspired air for 1 hr. (this value represents the maximum attainable concentration).	EYE IRRITATION	Irritant
		PRIMARY SKIN IRRITATION	Irritant
PRINCIPAL ROUTES OF ABSORPTION Oral, dermal.			
EFFECTS OF ACUTE EXPOSURE Cyanosis, tremors, convulsions, irritation to eyes, skin and mucous membranes.			
EFFECTS OF CHRONIC EXPOSURE Not known.			

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved self-contained breathing apparatus. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add non-combustible dry absorbent, shovel or sweep up and place in an approved DOT container and seal. Flush any residual material with water. Wash all contaminated clothing before reuse.

In the event of a massive spill, use the emergency phone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/> UNSTABLE <input type="checkbox"/> AT <u>boiling pt.</u> °F	HAZARDOUS POLYMERIZATION	MAY OCCUR
CONDITIONS TO AVOID		WILL NOT OCCUR <input checked="" type="checkbox"/>
INCOMPATIBILITY (Material To Avoid)	Oxidizing materials.	
HAZARDOUS DECOMPOSITION PRODUCTS	Hydrogen fluoride and nitrogen oxides at 240°C	

SECTION IX - PHYSICAL DATA

MELTING POINT	9.75°C	VAPOR PRESSURE	VOLATILES
BOILING POINT	404°F	SOLUBILITY IN WATER	insoluble
SPECIFIC GRAVITY (H ₂ O = 1)	1.442	pH	EVAPORATION RATE
	@ 25°C		VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels DATE 7/29/80

Department of Environmental Hygiene and Toxicology



CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

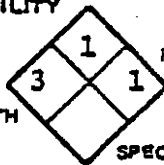
EMERGENCY PHONE (203) 356 - 2345



EMERGENCY PHONE (203) 356-2345

Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

**MATERIAL
SAFETY DATA**

10910109-5/8

10910110

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS Toluene Diisocyanate 80-20		
CHEMICAL FAMILY Isocyanate	FORMULA C₉H₆N₂O₂	TRADE NAME TDI-80-20
DESCRIPTION Clear water white to pale yellow liquid with sharp pungent odor.		CAS NO. 26471-62-5

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Do not take internally. Avoid breathing mist or vapor. STORAGE: Protect against physical damage. Store in a cool, dry, well-ventilated location, away from areas where the fire hazard may be acute. Outside or detached storage is preferred. If stored in tanks it should be blanketed with an inert gas such as nitrogen or with dry air. Separate from oxidizing materials.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
Eyes Goggles Gloves Rubber, NBR or PVA. Other Coveralls, impervious footwear.	As required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD 270°F	OSHA CLASSIFICATION Class IIIB Combustible liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water, carbon dioxide or dry chemical. Use water to keep the exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 0.02 ppm	
SYMPTOMS OF OVER EXPOSURE Skin, eye and mucous membrane irritant. May cause burns and irritation to lungs, labored breathing. Allergic sensitization to skin and respiratory tract.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Flush thoroughly with water for 15 minutes. Call a physician.
EYES	Flush thoroughly with water for 15 minutes, Call a physician.
INGESTION	Do not induce vomiting, give plenty of water to drink. Call a physician.
INHALATION	Remove victim to fresh air. Notify physician of exposure. If breathing is labored, see a physician.

Chemical TDI 80-20

CAS No. 26471-62-5

10910111

CHEMICAL NAME Toluene Diisocyanate 80-20

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50	5.8g/kg (rats)	CARCINOGENIC	Not known to be carcinogenic
ACUTE DERMAL LD 50	> 2g/kg (rabbits)	MUTAGENIC	Not known to be mutagenic
ACUTE INHALATION LC 50	> a nominal concentration of 2 mg/liter of inspired air for 1 hour.	EYE IRRITATION	Irritation and/or burns.
PRINCIPAL ROUTES OF ABSORPTION		PRIMARY SKIN IRRITATION	Irritation and/or burns
Inhalation, oral.			
EFFECTS OF ACUTE EXPOSURE Skin, eye & mucous membrane irritant. May cause burns to GI tract, irritation to lungs, labored breathing. Allergic sensitization of skin & resp. tract.			
EFFECTS OF CHRONIC EXPOSURE Damage to lungs, allergic sensitization. Pre-employment physical should exclude persons with recurring pulmonary disease and/or allergic history.			

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved self-contained breathing apparatus, or air supplied respirator. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add dry absorbent, sweep up material and place in an approved DOT container and seal. Keep container cool. Clean any remaining material with a neutralizing solution, 10% Isopropyl Alcohol, 85% Water, 5% Ammonia. Wash all contaminated clothing before reuse.

In the event of a massive spill, use the emergency phone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean-up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate Federal, State and Local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/>	UNSTABLE	AT _____ °C _____ °F	HAZARDOUS POLYMERIZATION	MAY OCCUR <input checked="" type="checkbox"/>
				WILL NOT OCCUR
CONDITIONS TO AVOID Water or incompatible materials in a closed system.				
INCOMPATIBILITY (Material To Avoid) Acids, bases and alcohols.				
HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, nitrogen oxides, traces of cyanide.				

SECTION IX - PHYSICAL DATA

MELTING POINT	53-56°F	VAPOR PRESSURE	0.01	VOLATILES
BOILING POINT	484°F	SOLUBILITY IN WATER		EVAPORATION RATE
SPECIFIC GRAVITY (H ₂ O = 1)	1.22	PH		VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels

DATE 4/1/80 (Rev. 6/18/80)

Department of Environmental Hygiene and Toxicology



CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

EMERGENCY PHONE (203) 356-2345